

EXHIBIT 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

EFFYIS, INC., and)	CASE NO. 3:18-cv-13391
HOTTOLINK, INC.,)	
)	HON. ROBERT H. CLELAND
Plaintiffs/Counter-Defendants)	
)	
vs.)	
)	
DARREN KELLY,)	
)	
Defendant/Counter/Plaintiff)	

DEFENDANT/COUNTER-PLAINTIFF'S
RESPONSES TO PLAINTIFFS/COUNTER-DEFENDANTS'
SECOND SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS

PLAINTIFFS' SECOND SET OF INTERROGATORIES

1. Please identify and list by name and account number all frequent flyer mile or reward accounts, hotel reward accounts and rental car reward accounts used by you at any time during the period January 1, 2015 through December 18, 2019.

ANSWER:

Defendant objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

2. For all of your travel – domestic and abroad – during the period January

1, 2015 through December 18, 2019, please identify each destination(s), the duration of your stay at each destination and the purpose or purposes of the travel.

ANSWER:

Defendant objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

3. Did you apply for any positions of employment during the period January 1, 2015 through December 18, 2019? If your answer is “yes,” then please identify the following:

- a. The name and address of the prospective employer;
- b. The position for which you applied; and
- c. The date you applied for the position.

ANSWER:

Defendant objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

**RESPONSES TO PLAINTIFFS' SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS**

1. Please provide copies of all statements for the period of January 1, 2015 through December 18, 2019 for frequent flyer mile or reward accounts, hotel reward accounts and rental car reward accounts used by you at any time during the period January 1, 2015 through December 18, 2019.

ANSWER:

Defendant objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

2. Please provide all documents within your possession, dominion or control that contain information related to the answers you provided to Interrogatory No. 3.

ANSWER:

Defendant objects to the information requested to the extent that it is unduly vague and/or ambiguous. Defendant also objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

3. Please provide copies of your calendar for the period January 1, 2015 through December 18, 2019.

ANSWER:

Defendant objects to the information requested to the extent that it is burdensome

and oppressive. Defendant further objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

4. Please provide copies of all credit card statements for every credit card owned or used by you for purchases made between January 1, 2015 through February 24, 2017.

ANSWER:

Defendant objects to the information requested to the extent that it is overly broad, unduly vague and/or ambiguous, burdensome and oppressive. Defendant further objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

5. Please provide copies of any agreements or documents within your dominion, possession or control that were executed by you and the Plaintiffs during the period November 1, 2014 and February 24, 2017.

ANSWER:

Defendant objects to the information requested to the extent that it is unduly vague and/or ambiguous. Without waiving these Objections, and subject to them, please see Employment Agreement and Purchase Agreement currently in Plaintiffs' possession.

6. Please provide a copy of any agreements entered into at any time between Plaintiffs and Effyis Acquisition Inc. that you are within your possession,

dominion or control.

ANSWER:

Defendant objects to the information requested to the extent that it is unduly vague and/or ambiguous. Without waiving these Objections, and subject to them, please see Employment Agreement and Purchase Agreement currently in Plaintiffs' possession.

7. Please provide copies of your personal Form 1040 Federal and state income tax returns and all schedules for the years 2015, 2016, 2017 and 2018.

ANSWER:

Defendant objects to the information requested to the extent that it is overly broad, unduly vague and/or ambiguous, burdensome and oppressive. Defendant further objects to this request since it is not relevant to the claim or defense of any party and the proportional needs of the case.

Respectfully submitted,

HOWARD & HOWARD ATTORNEYS PLLC

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